

1 MICHAEL J. SHEPARD (SBN 91281)

mshepard@kslaw.com

2 **KING & SPALDING LLP**

50 California Street, Suite 3300

3 San Francisco, California 94111

4 Telephone: +1 415 318 1221

5 KERRIE C. DENT (admitted *pro hac vice*)

kdent@kslaw.com

6 **KING & SPALDING LLP**

1700 Pennsylvania Avenue, NW, Suite 900

7 Washington, DC 20006-4707

8 Telephone: +1 202 626 2394

9 CINDY A. DIAMOND (SBN 124995)

cindy@cadiamond.com

10 **ATTORNEY AT LAW**

58 West Portal Ave #350

11 San Francisco, CA 94127

12 Telephone: +1 408 981 6307

13 Attorneys for Defendant

14 ROWLAND MARCUS ANDRADE

15
16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA**

18 **SAN FRANCISCO DIVISION**

19 UNITED STATES OF AMERICA,

20 Plaintiff,

21 v.

22 ROWLAND MARCUS ANDRADE,

23 Defendant.

Case No. 3:20-cr-00249-RS

**DEFENDANT ANDRADE'S
ADMINISTRATIVE MOTION TO FILE A
REPLY BRIEF IN EXCESS OF 15 PAGES**

Judge: Hon. Richard Seeborg, Chief Judge

24
25 Defendant Rowland Marcus Andrade hereby moves this court for an Order, Attachment
26 1, permitting the entry of a defense filing in excess of the 15-page limit set by Local Criminal
27 Rule 47-2(d) (by reference to Civil Local Rule 7-3(c)).
28

1 Defendant Andrade is seeking to file his Reply Brief in Support of Motion for
2 Evidentiary Hearing to Address Government Misconduct and to Seek Sanctions with a
3 page count in excess of 15 pages. Given the breadth of the factual and legal matters Mr.
4 Andrade is compelled to address within the government's 25-page Opposition, and the
5 importance of this Reply to Mr. Andrade's right to present an effective defense, *see*
6 *Sherman v. Gittere*, 92 F.4th 868, 878-879 (9th Cir. 2024) ("The constitutional right to 'a
7 meaningful opportunity to present a complete defense' is rooted in both the Due Process
8 Clause and the Sixth Amendment"), the defense respectfully seeks an exception to Crim.
9 L.R. 47-2(d). Not counting the Title page, Table of Contents, and Table Authorities, the
10 brief is only one page beyond what the Rule permits.

11
12 Respectfully submitted,

13 DATED: February 3, 2025

KING & SPALDING LLP

14
15 By: /s/ Michael J. Shepard

MICHAEL J. SHEPARD

KERRIE C. DENT

CINDY A. DIAMOND

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17 Attorneys for Defendant
18 ROWLAND MARCUS ANDRADE
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